

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

WAVE 12 CASES
LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT MOTIONS AND
REPLY BRIEFINGS REGARDING ABBAS SHOBEIRI, M.D., FOR WAVE 12**

Come now, Defendants Ethicon, Inc. and Johnson & Johnson (collectively, "Ethicon"), and hereby move to exclude certain general opinions of one of Plaintiffs' experts, Dr. Abbas Shobeiri. Defendants adopt and incorporate by reference the *Daubert* motion filed against Dr. Shobeiri for Ethicon Wave 1, Dkt. Nos. 2073 (motion), 2077 (memorandum in support), and supporting Reply brief, Dkt. 2219, as well as their supplemental memorandum of law filed in Ethicon Wave 3 cases, Dkt. Nos. 2764 and 2767, which addresses the Court's Wave 1 ruling with respect to Dr. Shobeiri. *See* Order, Dkt. No. 2685.

Ethicon respectfully requests that the Court exclude Dr. Shobeiri's testimony, for the reasons expressed in the Wave 1 and 3 briefings. This notice applies to the Wave 12 cases identified in Exhibit A attached hereto.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage